3M Environmental, Health and Safety Operations

PO Box 33331
St. Paul, MN 55133-3331
651 778 6442

January 12, 2006

VIA FAX 215/814-5103 and
UNITED PARCEL SERVICE

3M

Mr. Harry R. Steinmetz (3HS62)
U.S. Environmental Protection Agency, Region III
1650 Arch Street
Philadelphia, PA 19103-2029

Re: Safety Light Corporation Site
Bloomsburg, Pennsylvania

Dear Mr. Steinmetz:

In response to EPA's Request for Information concerning the Safety Light Corporation Site, enclosed is 3M Company's response.

Our investigation indicates that 3M did not arrange for the disposal or treatment or arrange for transportation for disposal or treatment of waste materials, including hazardous substances, at the Site or to the Site. Rather, 3M purchased radioactive devices or sources from Safety Light, in addition to arranging for the reprocessing or return of certain devices to Safety Light, U.S. Radium Corporation, Isolite and Self-Powered Lighting.

Please be assured we take this matter seriously and will continue to cooperate with your agency. Our investigation continues and our responses will be supplemented if more information is discovered.

Sincerely,

Robert A. Paschke
Manager, 3M Corporate Environmental Programs

Enclosure

3M Company Response to
the Information Request from
U.S. Environmental Protection Agency, Region III
for the Safety Light Site

In response to the undated Information Request of the U. S. Environmental Protection Agency ("U.S. EPA"), received November 16, 2006, relating to the Safety Light Corporation Site in Bloomsburg, Pennsylvania, 3M Company ("Respondent") responds pursuant to Section 104(e) of the Comprehensive Environmental Response, Compensation and Liability Act of 1980, 42 U.S.C. S 9601 et seq. ("CERCLA"). U.S. EPA project manager, Harry Steinmetz, extended the time for this response to January 12, 2006.

Respondent states that Robert Paschke, Manager, Corporate Environmental Programs and staff of Respondent, including the Office of General Counsel, have been involved in preparing the responses to this Information Request. Respondent states as follows:

General Response:

1. Respondent continues to investigate this matter and will supplement this response if any responsive information is obtained by its investigation.

2. By responding to this information request, Respondent in no way admits and does not believe that it generated hazardous substances, pollutants or contaminants which were disposed of at the Safety Light Site, and reserves and does not waive any and all rights and defenses.

3. Respondent objects to certain questions to the extent they are overly broad, burdensome, not reasonably calculated to lead to information concerning the identification, nature and quantity of hazardous substances at the Safety Light Site, and seek information not in Respondent's possession.

4. Respondent objects to these requests to the extent they assert that Respondent arranged for disposal or treatment or arranged for transportation for disposal or treatment of waste materials, including hazardous substances, at the Safety Light Site.

5. Respondent objects generally to the questions to the extent they seek information protected by the attorney-client and work product privileges.

Responses to Specific Requests:

1. Describe in detail the business relationship between 3M and Safety Light.

Response: Respondent's comprehensive investigation focused on 3M's Health Physics Department. The department has responsibility for oversight of the company's use of radiation sources.

The department was established in 1964 under the leadership of Robert G. Wissink. Unfortunately, Mr. Wissink passed away approximately three years ago and would have been the most knowledgeable person concerning the department and company's involvement with Safety Light and the other referenced entities. This response sets forth sources of information discovered during the course of respondent's comprehensive investigation:

Two Safety Light Ledger Sheets with transaction dates of 2/3/59, 6/25/59, 7/8/59, 1/19/60, and 7/7/60 that accompanied EPA Information Request:

Ionotron devices:
While the ledger sheet columns are not labeled, the sheets indicate 3M may have purchased Ionotron devices from Safety Light, on three occasions. The 6/25/59 entry appears to cover the recharging of an Ionotron device. The Po210 material in the device has a half life of 138 days. If residual material remained at Safety Light, there would not be any concerns about this material since the residual material would be completely decayed.

Po210 nitrate source:
The other purchase was for Po210 nitrate in 1/19/60. There was no mention of a recharging or reprocessing this material.

Documents from 3M's Health Physics Department:

In the course of respondent's investigation the following documents were discovered:

- Copy of a 3M Health Physics survey, dated 12/23/64. The survey discusses respondent's use of devices manufactured by U.S. Radium Corporation along with the reprocessing of two static elimination bars containing Po 210.
- Documents relating to a 5/5/95 purchase of two tritium sources from Safety Light.
- A purchase order relating to the 2/28/98 purchase of 50 1 curie tritiated foil sources from Safety Light.
- Documents relating to the return of an Exit sign* on 4/25/00 from 3M's Fairmont, MN facility to Safety Light.
- A series of e-mails from April 2003 indicating the return of two Exit signs* to Self-Powered Lighting that were discovered during the demolition of 3M's former Bedford Park, IL facility.
- Two e-mails discussing the return of a new Exit sign* to Isolite from 3M Austin, TX facility.

*Exit signs are shipped pursuant to Department of Transportation regulations as an "Accepted package – instrument or article." They are NOT shipped as a hazardous material; they are NOT shipped as hazardous waste with a manifest.
Safety Light and the related entities have had different policies over the years on whether to charge for the return of Exit signs.

Documents and Information from 3M's Sourcing Operations:

Staff from 3M Sourcing Operations reported a vendor record for Safety Light Corporation was set up in 1950. However, only one transaction, dated 2/28/98, was discovered. Respondent purchased 50 1 curie tritiated foil sources . This transaction is referenced above.

Vendor records could not be located for U.S. Radium, Lime Ridge Industries, USR Industries, USR Metals, and Metreal. A vendor record for Isolite was set up 4/10/00; there is no record of any payments occurring.

2. Did 3M ever transport and/or broker hazardous substances and/or radioactive waste or other wastes that were disposed of or reclaimed by U.S. Radium, Lime Ridge Industries, USR Industries, USR Metals, Metreal or Isolite to the Site?

   Response: See General Response. See Response to Request No. 1

3. If you answered "yes" to Question 2, please answer the following questions:

   a. provide the name, current address (or most recent address available), telephone number, and contact person for each customer/generator/transporter for which you transported/brokered hazardous substances, radioactive waste or other wastes.

   b. Provide the time period during which you transported/brokered each customer/generator/transporter's hazardous substances, radioactive waste or other wastes.

   c. For each customer/generator/transporter for which you transported/brokered hazardous substances, radioactive waste or other wastes, provide:

      i. the entity which received the hazardous substances, radioactive waste or other wastes (i.e., U.S. Radium, Lime ridge Industries, USR Industries, USR Metals, Metreal, Isolite);

      ii. the type of hazardous substances, radioactive waste or other wastes that was disposed/reclaimed;

      iii. the amount of hazardous substances, radioactive waste or other wastes transported/brokered to the site by you;

      iv. the dates of the pickup/delivery of the hazardous substances, radioactive waste or other wastes;

v. all personal and internal company documents and correspondence regarding the type and amount of hazardous substances, radioactive waste or other wastes, dates transported/brokered to the site, and transactions with U.S. Radium, Lime ridge Industries, USR Industries, USR Metals, Metreal or Isolite;

vi. the name, title, areas of responsibility, current (or most recent) addresses, and telephone numbers of other parties that have documentation or information pertaining to the transportation/disposal of hazardous substances, radioactive waste or other wastes at the Site.

Response: See General Response. See Response to Request No. 1

4. Did 3M ever generate radioactive wastes or other wastes that were disposed of or reclaimed by U.S. Radium, Lime ridge Industries, USR Industries, USR Metals, Metreal or Isolite at the Site?

Response: See General Response. See Response to Request No. 1

5. If you answered "yes" to Question 4, please address the following issues:

a. Please provide the following information regarding all wastes and by-products produced by your company during the period 1945 to the present:

i. the nature of radioactive waste or other wastes, hazardous substances, and/or by-products used, including their chemical content, characteristics, and physical state (i.e., liquid, solid, gas, or in the form of contaminated rags, cups, containers). Provide chemical analyses and Material Safety Data Sheets ("MSDSs"). If these analyses are not available for the period 1977-1991, submit analyses for the time period closest to these dates and describe, in detail, any changes in the process(es) in which radioactive waste or other wastes were produced that would affect the chemical analyses;

ii. the annual quantity of radioactive waste or other wastes, hazardous substances, and/or by-products used or generated;

iii. the process(es) in which radioactive waste or other wastes, hazardous substances, and/or by-products were used or the process(es) that generated each;

iv. the types of containers used to treat, store, or dispose of radioactive waste or other wastes, hazardous substances, and/or by-products; and

v. the method of treatment and/or disposal of the above.

Response: See General Response. See Response to Request No. 1

b. Provide the names, titles, areas of responsibility, addresses, and telephone numbers of all persons, including you, who, during the period 1945 to the present may have:

i. disposed of or treated radioactive or hazardous materials at the Site;

ii. arranged for the disposal or treatment of radioactive or hazardous materials at the Site; and

iii. arranged for the transportation of radioactive or hazardous materials to the Site (either directly or through transshipment points) for disposal or treatment.

Response: See General Response. See Response to Request No. 1

c. If you response to the above includes the contracting of a hauler or transporter to transport and/or dispose of wastes, explain these arrangements and provide documentation confirming the nature of those transactions. Please identify:

i. the persons with whom you, or other such persons, made such arrangements;

ii. every date on which such arrangements took place;

iii. for each transaction, the nature and quantity of material, including its chemical content, characteristics, physical state (i.e., liquid, solid), and the process for which the substance was used or the process that generated the substance;

iv. the precise locations at which each material was disposed or treated at the Site;

v. the persons who selected the Site as the place at which materials were disposed or treated;

vi. the final disposition of each material involved in such transactions; and

vii. the names of employees, officers, owners, and agents for each transporter.

Response: See General Response. See Response to Request No. 1

d. For each and every instance in which you/your company arranged for

disposal or treatment of material at the Site, identify:

i. the quantity (number of loads, gallons, drums) of materials that were used, treated, transported, disposed, or otherwise handled by you; and

ii. any billing information and documents (invoices, trip tickets, manifests) in your possession regarding arrangements made with your company to generate, treat, store, transport, or dispose of materials at the Site.

Response: See General Response. See Response to Request No. 1

e. Provide the names, titles, and areas of responsibility of any persons, including all 3M employees, present and former, who are knowledgeable of the waste disposal practices of your company during the period 1945 to the present. Include current addresses and dates of birth for former employees.

Response: See General Response. See Response to Request No. 1.

f. Describe any permits or applications and any correspondence between 3M and any regulatory agencies regarding materials transported to or disposed of at the Site.

Response: See General Response. See Response to Request No. 1. As a courtesy, Respondent has attached a copy of its current materials license with the U.S. Nuclear Regulatory Commission. This license does not mention any materials transported to or disposed of at the Site. Vendors of radioactive devices or sources may not sell such devices or sources until they have verified that the purchaser has a valid license issued by the U.S. Nuclear Regulatory Commission.

g. Provide copies of any correspondence between 3M and any third party regarding materials transported or disposed of a the Site.

Response: N/A

h. Provide the identity of, and copies of any documents relating to, any other person who generated, treated, stored, transported, or disposed or who arranged for the treatment, storage, disposal, or transportation of such materials to the Site.

Response: See Response No. 1. See General Responses.

i. Provide the identities of all predecessors-in-interest who, during the period 1945 to the present, transported to or stored, treated, or otherwise disposed of any materials at the Site and describe in detail the nature of your

predecessor-in-interest's business.

Response: N/A

j. Provide the name, title, address, and telephone number of the person answering these questions on behalf of the respondent.

Response: Robert A. Paschke, Manager, 3M Corporate Environmental Programs, 3M Center, St. Paul, MN 55144-1000.

k. For each question, provide the name, title, area of responsibility, current address, and telephone number of all persons consulted in preparation of the answers, or who supplied documents reviewed or relied upon in the course of preparing your answers.

Response: 3M states that Robert Paschke, Manager, 3M Corporate Environmental Programs, and other staff of 3M, including in-house counsel, have been involved in preparing responses to these requests. In addition, 3M contacted the following individuals in connection with the preparation of these responses:

George Ann Biros
Senior Paralegal
3M Office of General Counsel

Fred Entwistle
Manager, 3M Health Physics

Casey George
Manufacturing Engineer
3M Reverse Supply Chain Services

Dan McGrane
Sr. Health Physicist, 3M Health Physics

Lynn A. Riemenschneider
Procurement Analyst, 3M Sourcing Operations

Kathy VanKeulen
Manager, 3M Sourcing Operations

6. If you have reason to believe there may be persons able to provide more detailed or complete responses to any question contained herein, or who may be able to provide additional responsive documents, provide the names, titles, areas of responsibility, current addresses, and telephone numbers of such persons as well as additional information or documents they may have.

Response: Respondent has no knowledge of any persons who would be able to provide a more detailed or complete response, or additional responsive documents, to this Request. See General Response. See Response to Request No. 1.

7. For each and every question contained herein, if information or documents responsive to this Information Request are not in your possession, custody, or control, then provide the names, titles, areas of responsibility, current addresses, and telephone numbers of the persons from whom such information or documents may be obtained.

Response: Respondent has no knowledge of any persons who would be able to provide a more detailed or complete response, or additional responsive documents, to this Request. See General Response. See Response to Request No. 1.

8. If you have any other information about other party(ies) who may have information that may assist the Agency in its investigation of the Site, or who may be responsible for the generation of, transportation to, or release of contamination at the Site, please provide such information. The information you provide in response to this request should include the party's name, address, type of business, and the reasons why you believe the party may have contributed to the contamination oat the Site or may have information regarding the Site.

Response: Other than information Respondent has provided in this response, along with the documents that accompanied the Information Request, Respondent does not have any other information concerning the Site.

9. If any of the documents solicited in this information request are no longer available, please indicate the reason why they are no longer available. If pertinent records or documents were destroyed or are missing, provide us with the following:

a. Your document retention policy;

b. A description of how the records were destroyed (burned, archived, trashed, etc.) and the approximate date of destruction;

c. a description of the type of information that would have been contained in the documents; and

d. The name, job title and most current address known by you of the person(s) who would have produced these documents; the person(s) who would have been responsible for the retention of these documents; and the person(s) who would have been responsible for the destruction of these documents.

Response: Respondent respectfully objects to Request No. 9 to the extent it is overbroad, unduly burdensome and seeks to impose obligations greater than required by the statute because it seeks information that is irrelevant to the identification, nature and quantity of materials at the Safety Light Site.

The scope and breadth of documents identified in, discussed in, or produced in response to these Requests are generally not addressed in any 3M document retention procedure. Documents consulted or referred to in preparing these responses may be retained for periods ranging from a matter of months to 10 years or more. Document retention procedures current in existence were not in place during the "Relevant Period." Documents covered by the current policy may have previously been retained or destroyed.

Without waiving this objective, all responsive documents located during the course of respondent's comprehensive investigation are attached in Exhibit A. See General Response. See Response to Request No. 1.

The responses provided above are based upon, and therefore necessarily limited by, records still in existence and information presently recollected and thus far discovered in the course of preparing these responses. Respondent reserves the right to make changes to the responses if at any time more accurate information is discovered.

EXHIBIT A
Survey

Interoffice Correspondence

Subject: Radiation Survey and Wipe Testing of Beta Gauges and Static Elimination Bars

irc: R. C. Bertelsen - 220-7W
L. A. Johnson - 23-3
W. F. Hartfiel, M.D. - 220-13W
H. W. Schmidt, M.D. - 220-13W

December 23, 1964

TO: E. M. ANTONINI - TAPE PRODUCTION ADM. - 24-1

FROM: ROBERT G. WISSINK - HEALTH PHYSICIST - 201-1

On December 14, 1964, radiation surveys and wipe tests were conducted on those static elimination bars and beta gauges used in tape production. These include the 250 mc. Krypton 85, Model BB-0038 source used in Industrial Nucleonics Model RTLK-UBH-60 beta gauge on the 11X Coater, and two Polonium 210 static elimination bars, each containing 36 mc., identified as Models LAB-204-1, U. S. Radium Corporation, Ionotron bars, and used in a U. S. Radium Corporation Model LAB-227 Static Eliminator. Also surveyed was a Tracerlab 10 mc. Strontium 90 source, Model S-2A and contained in a Model BG-1 gauge used on the Z Calender.

I. U. S. Radium Corporation Static Elimination Bars

These bars do not offer an external radiation hazard to personnel, because of the low penetrating ability of Polonium 210 alpha particles. For this reason an external radiation survey was not made. The bars were, however, wipe tested, and the results of the wipe tests are contained in a later section.

Neither bar was in use at the time of this survey. One had just been returned from U. S. Radium Corporation after being reprocessed, and the other was in temporary storage awaiting shipment for reprocessing. When the bars are in service they will not constitute an external radiation hazard to personnel, inasmuch as Polonium 210 contains only an alpha emitter. In the use of these bars one must be concerned with possible leakage of the material which could eventually result in inhalation or ingestion of Po-210 by personnel working with them.

II. Industrial Nucleonics Beta Gauge 11X Coater

A radiation survey was conducted by using a Geiger counter type radiation survey instrument while the source was in operation, and the source shutter was open. At one foot from the source a radiation measurement of 0.7 mrem. per hour was made. This radiation level is well within AEC allowable limits and offers no hazard to personnel working with it. Actually, personnel do not have ready access to within one foot of the gauge, and they are normally working substantial distances beyond this. Their routine radiation exposure would, therefore, be negligible.

Occasionally an operator must clean the gauge, but it is understood that this does not take long, and he does not normally come in direct contact with it. During such times as the gauge is being cleaned, the operator is careful not to rupture the disc between the radioactive source and the detector unit.

III. Tracerlab Beta Gauge on Z Calender

This beta gauge contains a 10 mc. Strontium 90 source for which a radiation survey and wipe test were made. The results of the wipe test are covered in the following section. The radiation measurements near this gauge showed less than 1 mrem. per hour at a distance of one foot. The operator routinely has contact with the gauge and frequently changes the location of it. The radiation level is sufficiently low, however, that a hazard to the operator does not exist as long as he handles the gauge in a normal manner. At the location in which the operator spends most of his time the radiation level is essentially background, and no hazard exists.

IV. Wipe Tests

The Strontium 90 and Polonium 210 sources can present a significant hazard with respect to possible leakage of the material. Strontium 90, if ingested or inhaled in sufficient quantities, is a hazard because it is deposited near the blood forming organs of the bone. Over a period of time the possibility of developing leukemia could exist. Polonium 210 is not considered as hazardous, as its half-life is shorter, but it does contain a more highly ionizing radioactive particle than the Strontium 90. The AEC license stipulates that sources of these types must be leak tested, the Strontium 90 at six month intervals, and the Polonium 210 at three month intervals.

Personnel should not be allowed to open the source housing or come into contact with the source itself on any of the beta gauges because of these possible hazards. Extreme care should be taken whenever the gauge must be cleaned, so as to not rupture the protective disc over the source. During this inspection there was no evidence that the discs on the beta gauges had been ruptured, or that the Polonium 210 foils had been damaged.

The leak tests that were conducted were sent to the Central Research Analytical Section for analysis. The results of these tests are as follows:

Polonium 210 bar #8 - Non-detectable
Polonium 210 bar # 108 - 0.01 micro microcuries
10 mc. Strontium 90 source - Non-detectable

These results are below the permissible limits allowed by the Atomic Energy Commission. If these tests should ever show activity above this limit, the sources will have to be removed and taken out of service.

V. Recommendations

1. During this survey the radiation measurements were sufficiently low that no recommendations are being offered, as long as the sources are used in their present manner. Should it become necessary to remove or repair the sources, the Radiation Safety Officer and Health Physicist should be notified so that appropriate monitoring can be established. Personnel should be restricted from opening the source housing itself and having any direct contact with the sources.

2. Personnel should be instructed to follow the advice of the warning signs on each of the gauges and to avoid approaching them at any closer distances than those recommended. At no time should there be any attempt to remove the sources from the housing.

3. If for any reason the use of these sources is altered or changed or the physical installation itself is changed, this office should be contacted to perform a new radiation survey and assess the potential hazards involved with the proposed new use.

VI. Future Testing and Surveying

1. The AEC license for the sources in tape production will expire in January, 1965, and it will need to be renewed. Under the present license all sources in the St. Paul area are to be used by or under the supervision of Dr. Paul Trott. To bring our licenses up to date and reflect actual conditions, the license will be changed and designate an individual within the plant as user and Radiation Safety Officer. It is understood that Mr. Lloyd Johnson will be the Radiation Safety Officer for tape production.

2. The responsibilities of the Radiation Safety Officer are:

a. Perform required leak tests as stipulated in the AEC license.
b. Arrange with the 3M Health Physicist for periodic radiation surveys as required by the AEC license.
c. Make certain individuals using the source are aware of the hazards which could be involved.
d. Be continually aware of the location of the sources and the way in which they are being used.
e. Notify the 3M Health Physicist whenever the location or use of the source changes.
f. Maintain a file containing the AEC license, license application, and results of radiation surveys and leak tests.
g. Assure compliance with the conditions of use stipulated in the AEC license.
h. Make certain appropriate radiation labels are clearly attached and maintained on the source housing units.

3. The new AEC license application will be forwarded to your office before being sent to the AEC, so that you might have an opportunity to review it and concur with the conditions stipulated therein.

RGW:ce

SAFETY LIGHT CORPORATION
4150-A OLD BERWICK ROAD, BLOOMSBURG, PA 17815
717-784-4344 FAX 717-784-1402

DATE: 2/27/95

FACSIMILE TRANSMITTAL COVER SHEET 1 NO. PAGES, INCLUDING THIS SH

TRANSMITTED TO:

THREE M ATTN: FRED ENTWISTLE

PHONE #:

FAX#: 612-736-2285

FOLLOWING OUR CONVERSATION TODAY, I CONTACTED OUR RSO - NORMAN FRITZ AND WAS GIVEN THE FOLLOWING INFORMATION FOR TITANIUM TRITIDE TARGETS:

1. MODEL #508-3
2. REGISTRATION OF RADIOACTIVE SEALED SOURCES AND DEVICES #NR-579-S-106-S

PLEASE CALL IF YOU HAVE FURTHER QUESTIONS.

REGARDS

JERRY L. SLOWICK

EXHIBIT A
5/5/95 purchase

FROM SAFETY LIGHT CORPORATION
4150A OLD BERWICK ROAD
BLOOMSBURG, PA 17815

FROM SAFETY LIGHT CORPORATION
4150A OLD BERWICK ROAD
BLOOMSBURG, PA 17815

SHIPMENT/INVOICE
MAY 3 1995

SLC SALE ORDER NUMBER

EXHIBIT A
5/5/95 purchase

SHIP TO

ORDER STATUS
PART COMP

CUSTOMER P.O. OR CONTROL NUMBER

CUSTOMER ACCOUNT NUMBER	CUSTOMER PURCHASE/CONTRACT NO.	MIL/CIV	CUSTOMER ORDER DATE	DATE ORDER BOOKED	SHIP CH

ORIG. TERR./PER CENT	SPLIT TERR./PER CENT	MARK %	ORDER PLACED BY	TERMS

ITEM	PROD CODE	CATALOG/WORK OR PRINT NUMBER	COMPLETE DATE	ORDER QUANTITY	MEAS	BACK ORDERED	SHIPPED	PACKAGE NO	WEIG
1							2		

REQUIRE UPDATED LICENSE PRIOR TO SHIPPING

NOTE - DO NOT DISCARD PA CONTAINERS UNTIL CONTENTS BEEN CHECKED AGAINST PA SLIP.

P.O.C F.O.C

THIS SHIPMENT CONTAINS _____ PACKAGES _____ CARTONS _____ CRATES _____ WOODEN BOXES

PACKED BY _____ DATE _____ SHIPPED BY _____ DATE _____ CHARGES _____

POSTMASTER: A COPY OF THIS MEMO B/L OR RECEIPT NO

TOTAL NO OF PKGS

TOTAL WEIGHT

SAFETY LIGHT CORPORATION

4150A OLD BERWICK ROAD/BLOOMSBURG, PA. 17815 (717) 784-4344

FAX 717-784-1402

EXHIBIT A

2/28/98 Purchase

SHIP TO

hree-M Company
. O. BOX 33121
CCTS. PAYABLE
T. PAUL MN 55133-3121

Three-M Company
CENTER BLDG. 260-6C-12
ATTN: HEALTH PHYSICS LAB
MAPLEWOOD
CUSTOMER P.O. OR CONTROL NUMBER [redacted]

1473	T278066		Check

1	T1/CU TARGET .50 INCH DIAM.	1 CI./PC	8 CI/IN2 50	50pcs 50 u

PURCHASE ORDER FOR 50 SOURCES, 1 CURIE EACH FOR USE IN 3M CUSTOM STATIC METERS

SOURCE MANUFACTURER: SAFETY LIGHT CORPORATION
MODEL #: LAB 508-3
0.5" DIAMETER TRITIATED COPPER FOIL
ISOTOPE: HYDROGEN-3 (H-3)
ACTIVITY OF EACH SOURCE: 1 CURIE
DATE OF MANUFACTURE: FEBRUARY 27, 1998

RQ, RADIOACTIVE MATERIAL
N.O.S. UN 2982

C 2/27/98

OACTIVE MATERIAL, N.O.S., 7, UN 2982, CARGO AIRCRAFT ONLY,
T, Adsorbed On Solid Carrier, Type A Packaging,
White, ___ Packages, 1.85 TBq (50 Ci).

hereby declare that the contents of this consignment are fully and curately described above by proper shipping name and are classified cked, marked and labeled, and are in all respects in the proper ndition for transport by air according to the applicable International and itional Government Regulations

SHIPPER'S SIGNATURE

INSTRUCTIONS

TOTAL AMOUNT

COMMENTS:

F.O.C

UPS

EXHIBIT A

Fairmont sign

3M Dispatch Ticket

724283

Purchase Order No. | Release No.

Ship To	
Ship To	Safety Light Corp.
Attention	Health Safety Officer
Address	4150-A Old Berwick Rd
City, State, Zip Code	Bloomsburg, PA 17815

Date Prepared: 4/24/00

Originator Signature: B R Moore

Loc. Bldg. Fl.: 080

Freight Terms: ☐ Ppd & Allowed ☐ Collect

Quantity Requested	Quantity Shipped	Unit	Description of Material
	1	ea	EXIT sign
			Ship UPS Ground
			LN 4-25
			1 Bx 4#

Return To

Material Received

Serial Number: 024305 | 3M Property Number: | Device Mfr.: Safety Light

Model Number: SLX-60 | Last Survey Date: | Surveyor:

Description: Exit Sign | Source Mfr.:

Ionizing Device Information

Radionuclide	Initial Activity		Mfr Date	SHMN	SHSN	Leak Test Frequency	Sealed?	License Nbr
H-3	7500	mCi	09/01/1996				No	22-57-03

Current Activity: 0.00 (as of 01/12/2006) Inventory Frequency: Semi-Annual

Location Of Device: Inactive | Date Of Effect: 04/25/2000 | Status: Inactive

RSO: [redacted] Fairmont, MN | Tape Mfg Div | 01 | 080

Comment: Exit sign returned to vendor.

EXHIBIT A
Fairmont sign

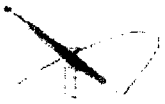
Device 1 of 1 where Serial Number begins 024305

evice History

Date of Effect	Location of Device	Status	License Nbr	RSO
03/20/2000	B. Moore's Office/Locked Storage	A	22-57-03	Bruce Moore
Comment	Found during audit - removed and locked up. Probably came in around October 1996.			

EXHIBIT A
Fairmont Sign

EXHIBIT A
Bedford Park Signs



Frederick B. Entwistle/US-Corporate/3M/US

04/03/2003 08:37 AM

To William F. Norge/EG-Engrg/3M/US@3M-Corporate

cc Jon Pecaut/EG-Engrg/3M/US@3M-Corporate, Nicolas K. Bates/US-Corporate/3M/US@3M-Corporate, Sidney R Stivland/EG-Engrg/3M/US@3M-Corporate

bcc

Subject Re: Exit Sign

Bill,
Thanks for the information. I contacted the manufacturer regarding the disposal of the sign. Self Powered Lighting will take the sign for disposal. They require prepayment of $75 by company purchase order or credit card. (That is certainly the cheapest disposal option for this quantity of tritium.) On payment of the return fee they will provide a Return Merchandise Authorization #. That number must appear on the shipping label or they will refuse delivery. The phone number of Self Powered Lighting is 1-800-777-9399. The ship to address is:

SPL
Attn: Health Safety Officer
4150-A Old Berwick Road
Bloomsburg PA 17815

If you give me your fax number I will send along the sheets SPL faxed me on the return process. If you can set up the RMA# and ship direct to SPL that would be preferable. If that is a problem, let us know.

Nick Bates will be providing you with the shipping paper information you need to send the sign out by FedEx.
Fred

Frederick B. Entwistle
220-3W-06
Corporate Health Physics
Tel: (651) 736-0740
Fax: (651) 736-2285
William F. Norge

William F. Norge

04/03/2003 06:44 AM

To: Frederick B. Entwistle/US-Corporate/3M/US@3M-Corporate
cc: Nicolas K. Bates/US-Corporate/3M/US@3M-Corporate
Sidney R Stivland/EG-Engrg/3M/US@3M-Corporate
Jon Pecaut/EG-Engrg/3M/US@3M-Corporate
Subject: Re: Exit Sign

Fred,

Attached are three pictures of the Beta-Light Exit Sign. The only damage appears to be the right edge of the sign. The H3 tubes look to still be intact.

The sign is a Model # CPI-700, Serial # 2468, 12.5 Curries, Mfg Date 3/79, Manufactured/Distributed by Self-Powered Lighting LTD. Elmsford; N.Y.

I will prepare the sign for shipping.

EXHIBIT A
Bedford Park Signs

Bill

William F. Norge
Principle Resident /Plant Engineer

3M Company - Optical Systems Division
7025 West Marcia Road, Milwaukee, WI. 53223

Tel: Local 414- 365-6280
Fax: Local 414- 365-1133
Cell Phone/ Pager: 414-899-7768
E-Mail: bhnorge@mmm.com

Frederick B. Entwistle

Frederick B. Entwistle
04/02/2003 09:25 AM

To: William F. Norge/EG-Engrg/3M/US@3M-Corporate
cc:
Subject: Exit Sign

Bill,
I will be having Nick Bates get back to you with shipping info on the exit sign as soon as he is in. In the meantime I would like to try and get a better handle on how damaged the sign is and whether some of the H-3 has been vented. The tritium is in the form of a gas in thin tubes that spell out EXIT. Can you tell if these tubes are damaged or not? One way to check would be by looking at the sign in a dark room (the sign only has about 25% of its original activity so it won't be very bright). If the tubes are intact they will glow. If the tubes are breached the tritium will have largely disappated but you should still wear gloves while handling the sign.

Please let me know a phone number to reach you at as well. The Triminet number is no longer in use and the regular number is "being checked for problems."
Thanks.
Fred

Frederick B. Entwistle
220-3W-06
Corporate Health Physics
Tel: (651) 736-0740
Fax: (651) 736-2285

<< Attachment Beta Lite Sign Front.JPG removed by Frederick B. Entwistle >>
<< Attachment Beta Lite Sign Back.JPG removed by Frederick B. Entwistle >>
<< Attachment Beta Lite Sign Label.JPG removed by Frederick B. Entwistle >>

EXHIBIT A
Austin sign

Michael A. Lewandowski/US-Corporate/3M/US
11/22/2005 02:59 PM

To Frederick Entwistle
cc
bcc
Subject Exit sign

When the exit signs were discovered in Austin (due to a maintenance employee bringing one to the RSO for disposal) this one was shipped back to the manufacturer. I don't find a record of it in HPIS. The other signs were added to HPIS after this one was disposed of. Perhaps it was never entered since it was returned to the vendor following discovery.

Mike Lewandowski

Six Sigma Black Belt
3M Medical Department
651-737-4452
651-736-2285 fax

Certified Health Physicist
3M Corporate Health Physics

----- Forwarded by Michael A. Lewandowski/US-Corporate/3M/US on 11/22/2005 02:54 PM -----

Patrick D. Sikorski/AT-Austin/3M/US
08/09/1999 07:06 AM

To Michael A. Lewandowski/US-Corporate/3M/US@3M-Corporate
cc
Subject Exit sign

Mike, FYI
The following Isolite exit sign was shipped out on, Fed. Ex., Friday PM.
Model # 2000
Serial # A811719

Regards,
Patrick Sikorski

p.s.,
Do these exit signs have to be on the semi-annual inventory?

T278066 PURCHASE ORDER PURGED 5-06-00 CART P596 FRAME 741
JR ST PAUL,MN RPT PAGE 93270
VENDOR S01379 01 SHIP TO A0749
SAFETY LIGHT CORP PUR REP - 321
4150A OLD HERWICK ROAD C/O REP - 321
BLOOMSBURG PA 17815 DEPT 04417
PO TYPE - 1N
CURRENCY - USD

REQ - MILLS JW, JERRY **REQ LOC - 042-06W-06** **TYPED - 1-13-98**
DLV - DAN MCGRANE DLV LOC - MAPLEWOOD ACKNOWLEDGE 0 00 00
FOB - ORIGIN ORGN ZIP 17815 COMPLETE 3 17 98
VIA - UPS DEST ZIP 55144 NEEDED 1 30 98
FRT - 23 INV LOC - TYPIST - **
INV - 01 RCV RPT - 00 VND ORD NR-
TAX - CODE 5, LOWER RATE MN E8 SHIP WGT- EXT PRICE- 6935.00
REQN- 2353792 PURGE CODE- 0 SPEC CODES - 0 41

ITEM	QUANTITY UT	DESCRIPTION	PRICE UT
01	50 EA	TRITIATED FOIL SOURCE RADIOACTIVE MATERIAL	138.70 EA
RCVD	50 EA	TRITTUM, 1 CURIE, APPROX. FORM: TRITIATED COPPER FOIL (5 CURIES/SQ.IN.) SIZE: 0.50 INCH DIAMETER DISC	
		** VENDOR INSTRUCTIONS	
		SHIP 2-13-98 TO ARRV BY 2-20-98	
		** SALES TAX INSTR	
		** STENCIL INSTRUCTIONS	
		** VENDOR INSTRUCTIONS	

********** ORDER ACCOUNTING **********

ITEM	CO	CTL	MAIN	SUB	JOB	PROJECT	SWO	%
01	01	A	1	6825	721			100.00

********** AUDIT TRAIL OF CHANGES TO THIS ORDER **********

ITEM SHPM	CHGD BY	CHG DATE	QUANTITY CHGD PROM	PRICE CHGD FROM	SHIP BY CHGD FROM	ARRV BY CHG FROM	LDN	INITIATED BY
01 01	321	1-15-98			1-23-98	1-30-98	LDN	3M
01 01	321	1 15 98		120.59				
	CURRENT		50 EA	138.70 EA	2-13-98	2-20-98		

********** ORDER HISTORY **********

REP	TYPE	DATE	COMMENT
321	31	011598	DELIVERY WILL BE 2-20.
321	31	021698	HAVING A PROBLEM GETTING THIS MATL OUT. WILL BE LATE BUT DATE NOT AVAILABLE.

********** RECEIVING REPORTS & DEBIT MEMO **********

**RCV RPT R00001
PK-LIST - 344370 DATE SHPD - 00-00-00 DATE RCVD 03 10 98
CARRIER NA MODE - 01 CAR-PRO NBR
NBR PCS 0 GROSS WGT 0 FRT TERMS -
FRT CHGS .00 RCV LOC 0018 260 PREPARED BY - RAA
PREPARED DTE- 3-17-98

ITEM	CURRENT RECEIPT	RECEIVED TODATE	ORDERED	DESCRIPTION	
01	50 EA	50	50 EA	TRITIATED FOIL SOURCE RADIOACTIVE MATERIAL	X

********** PAYMENT DATA **********

C	VR NO	DUE DT	INVOICE	INV DT	GROSS	VEND NO	QUAN	UT	ENT DT	T	CODES
	ITEM	QUANTITY UT	AMOUNT			RR NO					
A	207164	033098	0888239	022898	6952.00	S0137900			980312	T	AB

EXHIBIT A
Sourcing P.O.

T278066 PURCHASE ORDER PURGED 5-06-00 CART P596 FRAME 742 \
JR ST PAUL,MN RPT PAGE 93271 \
01 50.0 EA 6935.00 R00001 \
00 17.00 FRGT \
*** END OF ORDER *** \

EXHIBIT A
Sourcing P.O.

NRC FORM 374 U.S. NUCLEAR REGULATORY COMMISSION

Amendment No. 37

MATERIALS LICENSE

Pursuant to the Atomic Energy Act of 1954, as amended, the Energy Reorganization Act of 1974 (Public Law 93-438), and Title 10, Code of Federal Regulations, Chapter I, Parts 30, 31, 32, 33, 34, 35, 36, 39, 40, and 70, and in reliance on statements and representations heretofore made by the licensee, a license is hereby issued authorizing the licensee to receive, acquire, possess, and transfer byproduct, source, and special nuclear material designated below; to use such material for the purpose(s) and at the place(s) designated below; to deliver or transfer such material to persons authorized to receive it in accordance with the regulations of the applicable Part(s). This license shall be deemed to contain the conditions specified in Section 183 of the Atomic Energy Act of 1954, as amended, and is subject to all applicable rules, regulations, and orders of the Nuclear Regulatory Commission now or hereafter in effect and to any conditions specified below.

Licensee	In accordance with application dated August 22, 2002,
1. 3M Corporate	3. License number 22-00057-03 is renewed in its entirety to read as follows:
2. Health Physics Services 3M Center Bldg. 220-3W-06 P. O. Box 33283 St. Paul, MN 55133-3283	4. Expiration date September 30, 2012 5. Docket No. 030-04950 Reference No.

6. Byproduct, source, and/or special nuclear material	7. Chemical and/or physical form	8. Maximum amount that licensee may possess at any one time under this license
A. Any byproduct material with Atomic Nos. 1 through 83, inclusive	A. Sealed, plated or foil sources (which have been evaluated and registered with the NRC or an Agreement State)	A. No single source to exceed 5 curies
B. Americium-241	B. Sealed sources (which have been evaluated and registered with the NRC or an agreement State)	B. No single source to exceed 5 curies
C. Americium-241	C. Foil sources (NRD A-001 Series or other sources which have been evaluated and registered with the NRC or an Agreement State)	C. No single source to exceed 200 millicuries
D. Polonium-210	D. Sources (NRD Models P-2001, P-2021, P-2031, P-2042, P-2051 and P-2061 or other NRD sources which have been evaluated and registered with the NRC or an Agreement State)	D. No single source to exceed 324 millicuries

EXHIBIT A

NRC license

MATERIALS LICENSE

Pursuant to the Atomic Energy Act of 1954, as amended, the Energy Reorganization Act of 1974 (Public Law 93-438), and Title 10, Code of Federal Regulations, Chapter I, Parts 30, 31, 32, 33, 34, 35, 36, 39, 40, and 70, and in reliance on statements and representations heretofore made by the licensee, a license is hereby issued authorizing the licensee to receive, acquire, possess, and transfer byproduct, source, and special nuclear material designated below; to use such material for the purpose(s) and at the place(s) designated below; to deliver or transfer such material to persons authorized to receive it in accordance with the regulations of the applicable Part(s). This license shall be deemed to contain the conditions specified in Section 183 of the Atomic Energy Act of 1954, as amended, and is subject to all applicable rules, regulations, and orders of the Nuclear Regulatory Commission now or hereafter in effect and to any conditions specified below.

Licensee	In accordance with application dated August 22, 2002,
1. 3M Corporate	3. License number 22-00057-03 is renewed in its entirety to read as follows:
2. Health Physics Services 3M Center Bldg. 220-3W-06 P. O. Box 33283 St. Paul, MN 55133-3283	4. Expiration date September 30, 2012 5. Docket No. 030-04950 Reference No.

6. Byproduct, source, and/or special nuclear material	7. Chemical and/or physical form	8. Maximum amount that licensee may possess at any one time under this license
A. Any byproduct material with Atomic Nos. 1 through 83, inclusive	A. Sealed, plated or foil sources (which have been evaluated and registered with the NRC or an Agreement State)	A. No single source to exceed 5 curies
B. Americium-241	B. Sealed sources (which have been evaluated and registered with the NRC or an agreement State)	B. No single source to exceed 5 curies
C. Americium-241	C. Foil sources (NRD A-001 Series or other sources which have been evaluated and registered with the NRC or an Agreement State)	C. No single source to exceed 200 millicuries
D. Polonium-210	D. Sources (NRD Models P-2001, P-2021, P-2031, P-2042, P-2051 and P-2061 or other NRD sources which have been evaluated and registered with the NRC or an Agreement State)	D. No single source to exceed 324 millicuries

MATERIALS LICENSE
SUPPLEMENTARY SHEET

License Number
22-00057-03

Docket or Reference Number
030-04950

Amendment No. 37

6. Byproduct, source, and/or special nuclear material	7. Chemical and/or physical form	8. Maximum amount that licensee may possess at any one time under this license
E. Polonium-210	E. Sealed sources (Amersham Model PDM. 1002 or PDM.1002 Hn Series or other Amerhsam sources which have been evaluated & registered with the NRC or an Agreement State)	E. No single source to exceed 200 millicuries
F. Curium-244	F. Sealed sources (which have been evaluated and registered with the NRC or an Agreement State)	F. No single source to exceed 500 millicuries
G. Plutonium-238	G. Sealed sources (Texas Nuclear Model 570-57242B)	G. Two sources not to exceed 30 millicuries each

9. Authorized Use:

A. through G. (1) For possession and use and sample analysis in level, thickness, density, fill/level measuring, static measuring devices and static elimination devices, x-ray flourescent analyzers and gas chromatography devices which have been evaluated and approved for licensing purposes and authorized for distribution under a license issued by the U.S. Nuclear Regulatory commission or an Agreement State.

(2) Possession and use incident to installation, relocation, maintenance, repair, and removal from service; installation and replacement of sealed sources; and instruction and training of individuals in the use of gauging/measuring devices that have been registered pursuant to Section 32.210 of 10 CFR Part 32 or equivalent Agreement State regulations described in letter dated May 15, 1996 as a service to customers.

CONDITIONS

10. Licensed material shall be used only at 3M facilities anywhere in the United States where the U.S. Nuclear Regulatory Commission maintains jurisdiction for regulating the use of Licensed material.

MATERIALS LICENSE
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License Number
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Docket or Reference Number
030-04950

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11. Licensed material shall be used by, or under the supervision of individuals who have received the training described in application dated August 22, 2002 and January 28, 1992 and who have been designated by the licensee's Corporate Radiaiton Safety Officer, Frederick B. Entwistle. The licensee shall maintain records of individuals designated as users for 3 years following the last use of licensed material by the individual.

12. A. The Radiation Safety Officer (RSO) for this license is Frederick B. Entwistle.

    B. Before assuming the duties and responsibilities as RSO for this license, future RSOs (corporate and site) shall have successfully completed one of the training courses described in Criteria in Section 8.7.1 of NUREG-1556, Volume 4, dated October 1998.

13. A. Sealed sources and detector cells shall be tested for leakage and/or contamination at intervals not to exceed the intervals specified in the certificate of registration issued by the U.S. Nuclear Regulatory Commission under 10 CFR 32.210 or by an Agreement State.

    B. Notwithstanding Paragraph A of this condition, sealed sources or detector cells designed to primarily emit alpha particles shall be tested for leakage and/or contamination at intervals not to exceed 3 months.

    C. In the absence of a certificate from a transferor indicating that a leak test has been made within the intervals specified in the certificate of registration issued by the U.S. Nuclear Regulatory Commission under 10 CFR 32.210 or by an Agreement State, prior to the transfer, a sealed source or detector cell received from another person shall not be put into use until tested and the test results received.

    D. Sealed sources and detector cells need not be tested if they contain only hydrogen-3; or they contain only a radioactive gas; or the half-life of the isotope is 30 days or less; or they contain not more than 100 microcuries of beta and/or gamma emitting material or not more than 10 microcuries of alpha emitting material.

    E. Sealed sources and detector cells need not be tested if they are in storage and are not being used. However, when they are removed from storage for use or transferred to another person, and have not been tested within the required leak test interval, they shall be tested before use or transfer. No sealed source shall be stored for a period of more than 10 years without being tested for leakage and/or contamination.

    F. The leak test shall be capable of detecting the presence of 0.005 microcurie of radioactive material on the test sample. If the test reveals the presence of 0.005 microcurie or more of removable contamination, a report shall be filed with the U.S. Nuclear Regulatory Commission in accordance with 10 CFR 30.50(b)(2), and the source shall be removed immediately from service and decontaminated, repaired, or disposed of in accordance with Commission regulations. The report shall be filed within 5 days of the date the leak test result is known with the appropriate U.S. Nuclear Regulatory Commission, Regional Office referenced in Appendix D of 10 CFR Part 20. The report shall specify the source involved, the test results, and corrective action taken.

MATERIALS LICENSE
SUPPLEMENTARY SHEET

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Docket or Reference Number
030-04950

Amendment No. 37

G. Tests for leakage and/or contamination, including leak test sample collection and analysis, shall be performed by the licensee or other persons specifically licensed by the U.S. Nuclear Regulatory Commission or an Agreement State to perform such services.

H. Records of leak test results shall be kept in units of microcuries and shall be maintained for 3 years.

15. Sealed sources and detector cells containing licensed material shall not be opened.

16. This license does not authorize commercial distribution of licensed material.

17. A. Installation, initial radiation survey of devices, relocation, maintenance, repair, and removal from service of the devices containing licensed material and installation, replacement, and disposal of sealed sources containing licensed material used in the devices shall be performed only by the device manufacturer, Michael W. Hinz, Frederick B. Entwistle, John A. Bauhs, Richard R. Hedlund, Michael Lewandowski, Nicholas K. Bates, Daniel J. McGrane, Jason T. Flora or by other persons specifically authorized by the Commission or an Agreement State to perform such services.

B. Installation, initial radiation survey of devices, relocation, maintenance, repair, and removal from service of the devices containing licensed material may also be performed by the "Site" Radiation Safety Officer. The Corporate Radiation Safety Officer shall maintain records of the designated "Site" Radiation Safety Officers.

18. The licensee shall assure that the devices are tested for proper operation of the on-off mechanism and indicator, if any, at intervals not to exceed six months or at such other intervals as are specified by the manufacturer. The licensee shall maintain records of the results of these tests for a period of one year after the next required test is performed. These records shall show the date(s) of performance and results of these tests as well as the name of the individual performing the test.

19. The licensee shall operate each gauge within the manufacturer's specified temperature and environmental limits such that the shielding and shutter mechanism of the source holder is not compromised.

20. The licensee shall conduct a physical inventory every six (6) months to account for all sealed, plated and foil sources received and possessed under the license. The records of the inventories shall be maintained for two (2) years from the date of the inventory for inspection by the Commission, and shall include the quantities and kinds of byproduct material, manufacturer's name and model numbers, location of each sealed, plated and foil source and the date of the inventory.

21. The licensee may transport licensed material in accordance with the provisions of 10 CFR Part 71, "Packaging and Transportation of Radioactive Material."

MATERIALS LICENSE
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22. A Health Physics audit as described in application dated January 28, 1992, shall be performed by Health Physics Services at each facility where licensed material is used, at a frequency not to exceed three years. Records of such audits shall be maintained for inspection by the Commission.

23. In addition to the possession limits in Item 8, the licensee shall further restrict the possession of licensed material to quantities below the minimum limit specified in 10 CFR 30.35(d) for establishing decommissioning financial assurance.

24. Except as specifically provided otherwise in this license, the licensee shall conduct its program in accordance with the statements, representations, and procedures contained in the documents including any enclosures, listed below. The Nuclear Regulatory Commission's regulations shall govern unless the statements, representations and procedures in the licensee's application and correspondence are more restrictive than the regulations.

    A. Applications dated August 22, 2002, and January 28, 1992, (as it pertains to health physics audits training of authorized users and servicing); and

    B. Letter dated May 15, 1996, (as it pertains to commerical service)

FOR THE U.S. NUCLEAR REGULATORY COMMISSION

Date SEP 16 2002

By _____
James R. Mullauer, M.H.S.
Materials Licensing Branch
Region III

3M CENTER, L A HENRICH
1(651) 733-8442
BUILDING 218-1S-02
ST. PAUL MN 55144

3

1 LBS 1 OF 1

SHIP TO: U.S. ENVIRONMENTAL PROTECTION
HARRY R. STEINMETZ (3HS62)
REGION III
1650 ARCH STREET
PHILADELPHIA, PA 19103

PA 191 9-05

UPS NEXT DAY AIR SAVER **1P**

TRACKING # 1Z 560 491 13 7479 9544

BILLING: P

PACKAGE # 9624583

TR 9.2.00 Z1055 48.0U 10/200F